

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

NOV - 7 1991

Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Petition to Amend Part 68 of)
the Commission's Rules to)
Include Terminal Equipment)
Connected to Basic Rate)
Access Services Provided via)
Integrated Services Digital)
Network Access Technology)

RM No. 7815

COMMENTS ON PETITION FOR RULEMAKING

U S WEST Communications, Inc. ("USWC"), through counsel and pursuant to Public Notice,¹ hereby comments on Southwestern Bell Telephone Company's ("SWB") Petition for Rulemaking ("Petition") concerning proposed amendments to Part 68 of the Federal Communications Commission's ("Commission") Rules.² USWC does not believe that the rules proposed by SWB are necessary. Nonetheless, to the extent that the proposed rules receive consideration, USWC requests that the following modifications to the specific rules proposed by SWB also be considered.

¹Public Notice, Report No. 1863, rel. Oct. 7, 1991 ("Public Notice").

²The Petition was filed on August 23, 1991.

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DISCUSSIONI. Section 68.2

Page 4 of the Petition is clear that the proposed addition to Part 68 is for the 2-wire, i.e., the U reference point interface, but the actual words proposed in the appendix are not clear. Proposed § 68.2(a)(10) should be changed to read:

of all terminal equipment to the Integrated Services Digital Network (ISDN) two-wire Basic Rate Access (BRA).

Also at Page 4 of the Petition, the proposal is to grandfather equipment "... provided that these terminal equipments are of a type that was directly connected to a standard ISDN BRA as of the [grandfather date]." (Emphasis supplied.) In the rationale, it is reasonably clear that "standard" means the Basic Rate Access interface specified in ANSI T1.601-1988, but that is not clear in the proposed text. For clarity, § 68.2(k)(2) should be changed to read:

... provided that these terminal equipments are of a type that was directly connected to a ISDN BRA of the type specified in ANSI T1.601-(year), as of (grandfather date).

II. Section 68.3

At Page 4 of the Petition, the proposed definition gets too involved in the technical description of the technology. For clarity, the definition should be revised to read:

ISDN Basic Rate U Reference Point Access

Interface: This is the interface specified in ANSI T1.601-(year). The tip and ring leads shall be treated as telephone connections for the purpose of fulfilling registration conditions.

III. Section 68.308

Pages 5 and 6 of the Petition address signal power output of the terminal equipment. SWB correctly states that the requirements of the "... ANSI standard[] will place adequate controls over the signal power output of the terminal equipment," and further states that, as a result, no specific signal power requirements are being proposed for Section 68.308. However, to omit a signal pulse amplitude requirement is inconsistent with Part 68. The following additional language is proposed, which creates an appropriate limitation in an appropriate manner:

68.308(i) Transmitted pulse characteristics of Basic Rate Access terminal equipment shall meet the requirements specified in ANSI T1.601-(year).

IV. Section 68.310

Page 6 of the Petition addresses Longitudinal Balance Limitations. In the appendix, the equation and the requirements are taken word for word from the industry proposed revision of ANSI T1.601. The proposed wording in the appendix following "(m) For ISDN BRA" should be replaced with the following, and the proposed Figure 68.310(m) should be omitted. The year will be provided by ANSI upon their approval of the recently revised standard:

The longitudinal balance shall meet the requirements of ANSI T1.601(year)

V. New Registration Jack

ANSI accredited Committee T1 - Telecommunications, through work in its T1E1 Technical Subcommittee, has standardized an eight position jack and plug arrangement as the physical Network Interface for the two-wire Basic Rate Access interface. The connector description and wiring are published in Committee T1 Technical Report #5 titled A Technical Report on Carrier to Customer Installation Interface Connector Wiring Configuration Catalog which is available to the public through the Exchange Carrier Standards Association. This connector is called a SJA11 (Standard Jack A11). We propose the Commission, by way of the public notice process, adopt the SJA11 in lieu of creating a new Registration Jack.

CONCLUSION

In the interest of fostering uniform national industry standards having international compatibility, the Commission should support such standards that currently exist, such as ANSI T1.601-1988 and its revision which is technically complete and is awaiting ANSI confirmation that its protocol requirements have been met. Both versions were written with liaisons with other international Standards setting bodies.

By referencing Committee T1 (industry) Standards in Part 68 rather than repeating the technical content of those Standards, the industry, through Committee T1 - Telecommunications, is left with the ability to negotiate, worldwide, important parameters without the need for a member company to petition for a rule making on every detail of the standard.

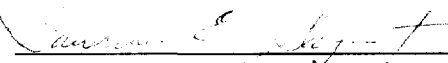
An example of the advantage of this is as follows: Longitudinal balance requirements in ANSI T1.601-1988 are different from those in its revision. The longitudinal balance requirements proposed by Southwestern Bell are from that revision. If the numeric values developed by the industry in 1988 had been written into Part 68, the United States industry would not have been able to write the 1991 revision with the new parameters without a rule making in Part 68 and international technical liaison would have been impaired.

Accordingly, USWC requests that the Commission, to the extent that it considers SWB's proposal, accept these modifications thereto.

Respectfully submitted,

U S WEST Communications, Inc.

By:



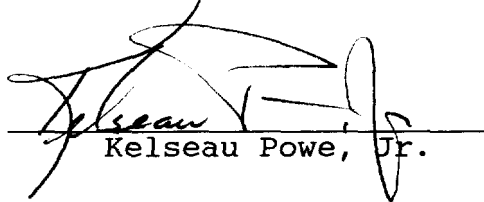
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November 7, 1991

CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify on this 7th day of November, 1991, that I have caused a copy of the foregoing **COMMENTS ON PETITION FOR RECONSIDERATION** to be hand delivered to the persons named on the attached service list.


Kelseau Powe, Jr.

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